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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

BEVERLY HARDY and ROBERT DAVID)
HARDY)

Plaintiffs,)

v.)

C. R. BARD, INC.; BARD PERIPHERAL)
VASCULAR, INCORPORATED,)
Defendants.)

Case No. 2:20-cv-00606-RFB-BNW

**STIPULATION AND [PROPOSED] ORDER TO
EXTEND TEMPORARY STAY**

On July 2, 2020 this Court ordered at the request of Plaintiff Debra Schwartzmiller and Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Incorporated (collectively, “the Parties”) a stay of the case deadlines until August 17, 2020. [Dkt. 29]. Pursuant to the Court’s July 2, 2020 order, the Parties to the above-captioned matter submit this stipulation to extend the stay while the Parties finalize the settlement.

The Parties participated in an inventory mediation on July 10, 2020. The mediation resulted in a proposed inventory settlement of several cases, including this one. The Parties are currently working on the terms of the settlement. Plaintiff’s counsel in this matter represents numerous plaintiffs with cases proceeding in this and other courts across the

country asserting similar claims against Defendants for injuries they contend arise out of their use of Defendants' IVC filters. Given the large inventory of cases, the Parties will need additional time to facilitate and finalize the settlement process for these cases. Counsel for Plaintiff has retained a neutral special master for the allocation process of the settlement for the entire inventory. The Parties will need 2 to 3 months to complete that part of the settlement process.

Therefore, the Parties request an additional 120 day stay in order to finalize the inventory settlement.

IT IS STIPULATED AND AGREED BY THE PARTIES that all activity in this case shall be stayed through and including December 15, 2020.

Respectfully submitted this 19th day of August, 2020

Counsel for Plaintiff

/s/ Melissa Fry Hague

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IT IS SO ORDERED.

Dated this 20th of August, 2020.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on **August 19, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Melissa Fry Hague

Attorney for Plaintiff